

## **EXHIBIT B**

**IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

In re:

NU RIDE INC., *et al.*<sup>1</sup>

Reorganized Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**DECLARATION OF ALAN D. HALPERIN PURSUANT TO  
28 U.S.C. § 1746 AND LOCAL RULE 3007-1 IN SUPPORT OF THE  
POST-EFFECTIVE DATE DEBTORS' AND CLAIMS OMBUDSMAN'S  
JOINT FOURTH (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CLAIMS  
(Insufficient Documentation, No Liability)**

Alan D. Halperin, under penalty of perjury, hereby declares as follows:

1. I am the Claims Ombudsman (the "Ombudsman") for the above-captioned debtors (collectively, the "Debtors") and I submit this declaration in support of the *Post-Effective Date Debtors' and Claims Ombudsman's Joint Fourth (Non-Substantive) Omnibus Objection to Claims (Insufficient Documentation, No Liability)* (the "Objection"), pursuant to which I, together with the Post-Effective Date Debtors, am requesting that this Court enter an order disallowing and expunging certain claims filed in the Cases<sup>2</sup>. Unless otherwise stated in this declaration, I have personal knowledge of the facts set forth herein.

2. Except as otherwise indicated, all facts set forth in this declaration are based upon my personal knowledge, my review (or the review of counsel, consultants and other professionals under my supervision) of business records kept by the Debtors in the ordinary course of business,

---

<sup>1</sup> The Reorganized Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Reorganized Debtors' service address is: Nu Ride Inc. c/o William Gallagher, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Objection.

the relevant proofs of claim, and/or the Claims Register maintained by Verita, the claims and noticing agent in the Cases. The grounds for the Objection are based on the review conducted.

3. I have personally reviewed the Objection and to the best of my knowledge and belief, the information contained on **Schedules 1 and 2** (the “Schedules”) to the Proposed Order attached as **Exhibit A** to the Objection is true and correct.

4. I and/or my counsel, consultants and other professionals reviewed all of the Claims identified in **Schedule 1** to **Exhibit A** to the Objection (the “Insufficient Documentation Claims”) and the supporting documentation, if any, filed therewith, and have determined that they were filed without sufficient documentation to constitute *prima facie* evidence of the validity and amount of the claim asserted. Indeed, in most cases, these claims merely list an amount, without including information, statements, agreements, or other supporting documentation providing indicia of a debt owed by the Debtors. We have reviewed and made reasonable efforts to research and reconcile the Insufficient Documentation Claims with the Debtors’ books and records, and believe that such documentation does not provide *prima facie* evidence of the validity and amount of these claims. Therefore, the Insufficient Documentation Claims should be disallowed and expunged in their entirety.

5. I and/or my counsel, consultants and other professionals reviewed all of the Claims identified in **Schedule 2** to **Exhibit A** to the Objection (the “No Liability Claims”) and the corresponding books and records of the Debtors and have determined that the Debtors have no liability for the underlying debt. We have reviewed and made reasonable efforts to research and reconcile the No Liability Claims with the Debtors’ books and records, and believe that such documentation does not provide *prima facie* evidence of the validity and amount of these claims. In many instances, the Debtors’ books and records reflect that the No Liability Claims in question

have been satisfied. Therefore, the No Liability Claims should be disallowed and expunged in their entirety.

6. Based on the foregoing, and to the best of my knowledge, information and belief, the information contained in the Objection and exhibits thereto is true and correct.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on: August 27, 2024

*/s/Alan D. Halperin, as Claims Ombudsman*  
Alan D. Halperin